

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

v.

**CRAIG D. PERCIAVALLE
JOSEPH A. RUNKEL
WILLIAM O. ADAMS**

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Criminal No. 23-cr-00070-JB

UNITED STATES' NOTICE REGARDING DISCOVERY

The United States of America, by and through Sean P. Costello, the United States Attorney for the Southern District of Alabama, and Glenn S. Leon, Chief of the Fraud Section, Criminal Division, Department of Justice, files this notice regarding the provision of information required by S.D. Ala. Criminal Local Rule 16 (“CrLR 16”) as required by the Scheduling Order. ECF No. 89. The United States has produced all information that it has identified as CrLR 16 discovery (with the exception of information that is subject to a different disclosure deadline set by the Scheduling Order).¹ The United States understands its duty to supplement its productions with all newly discovered information, evidence, or other material within the scope of CrLR 16. The United States will continue to review its files for any additional information that should be disclosed and abide by its obligations.

¹ On October 27, 2023, the United States received permission from counsel for Joseph Runkel to produce the documents deemed non-responsive to the email warrant that was executed on Runkel’s Microsoft account. The case team does not have access to these documents, as they were segregated after the execution of the warrant. The filter team will be producing the non-responsive documents to counsel for Craig Perciavalle and William Adams this month; they were already produced to counsel for Runkel in the initial discovery production. The case team does not believe that these documents fall within the scope of CrLR 16 but alerts the Court to this forthcoming filter team production out of an abundance of caution.

Respectfully submitted this 1st day of November 2023.

SEAN P. COSTELLO
UNITED STATES ATTORNEY

GLENN S. LEON
CHIEF, FRAUD SECTION

By: /s/ Christopher J. Bodnar
Christopher J. Bodnar
Assistant United States Attorney
United States Attorney's Office for the
Southern District of Alabama
60 South Royal Street, Suite 600
Mobile, Alabama 36602

By: /s/ Kyle C. Hankey
Kyle C. Hankey, Assistant Chief
Laura Connelly, Trial Attorney
Fraud Section
1400 New York Avenue, NW
Washington, D.C. 20005
Telephone: (202) 514-2000
Facsimile: (202) 514-0142